...ION
...ging Water in the West

U.S. Department of the Interior
Bureau of Reclamation

— Comment Card —

COMMENTS DUE BY WEDNESDAY, FEBRUARY 28, 2007

PLEASE PRINT

Date: 2/27/07

Name: Al Smith

Title (if applicable):

Telephone: 907-455-0667

Fax:

Organization/Business (if applicable):

E-Mail: albertfsmith@hotmail.com

Address: PO Box 85315

City: Fairbanks State: AK Zip: 99708

[X] Yes, I would like to be added to your mailing list: E-Mail [X] US Mail [ ]

The Bureau of Reclamation is seeking public comment on the adoption of a Long-Term Experimental Plan for the future operation of Glen Canyon Dam and other associated management activities. Your input on the scope of the project and the issues and alternatives that should be analyzed is greatly appreciated. Please write legibly.

Free the Colorado: Please include de-commissioning the dam as a legitimate option in the EIS. To truly manage "...to protect, mitigate adverse impacts to, and improve the values for..." Glen and Grand Canyons, the first step would be to eliminate the effect the dam has had on both ecosystems.

...old the card in half, tape the edges, and mail the completed card back to:
...egion, Attention: UC-402, 125 South State Street, Salt Lake City, Utah 84138-1147.

United States Department of the Interior
BUREAU OF INDIAN AFFAIRS
WESTERN REGIONAL OFFICE
TWO ARIZONA CENTER, 12TH FLOOR
400 NORTH 5TH STREET
PHOENIX, ARIZONA 85004

TAKE PRIDE IN AMERICA

IN REPLY
REFER TO:

BRANCH OF ENVIRONMENTAL QUALITY SERVICES
Office Number: (602) 379-6750
Fax Number: (602) 379-3833

TO: ***Jayne Kelleher*** FAX NUMBER: ***(801) 524-3858***

ORGANIZATION: ***BOR Upper Colorado Regional Office***

FROM: ***Amy Heuslein***

MESSAGE: ***Comments on Long-Term Experimental Plan***

NUMBER OF PAGES INCLUDING COVER SHEET: ***3***

DATE SENT: ***February 28, 2007***

☞ **NOTE: Effective 1/18/07, please use new address shown above.**

United States Department of the Interior
BUREAU OF INDIAN AFFAIRS
WESTERN REGIONAL OFFICE
400 NORTH 5TH STREET, 12TH FLOOR
PHOENIX, ARIZONA 85004

TAKE PRIDE IN AMERICA

IN REPLY
REFER TO:
Environmental Quality Services
File TR-4301-P5.12
(602) 379-6750

FEB 27 2007

Memorandum

To: Regional Director, Bureau of Reclamation
Upper Colorado Regional Office, Salt Lake City, Utah

From: Acting Regional Director, Western Regional Office

Subject: Cooperating Agency and Scoping Comments, Environmental Impact Statement, Adoption of a Long-Term Experimental Plan for the Future Operation of Glen Canyon Dam

Per your letter of invitation dated January 8, 2007, please designate the Bureau of Indian Affairs (BIA) Western Regional Office (WRO) as a Cooperating Agency in accordance with 40 Code of Federal Regulations (CFR) 1501.6 and 1508.5, for the Glen Canyon Dam (GCD) Long-Term Experimental Plan Environmental Impact Statement (EIS) process. We feel that the Bureau of Reclamation (Reclamation) and the proposed project will benefit from our involvement and participation in the National Environmental Policy Act (NEPA) process.

In accordance with the aforementioned regulations and in consideration of the federal government's overall trust responsibility toward Indian Tribes, the BIA/WRO recommends inviting those tribes that have been involved with the GCD Adaptive Management Program to become Cooperating Agencies, as the tribes can provide special expertise for the successful development and conclusion of environmental documentation for this undertaking.

The primary BIA point of contact for this project is Ms. Amy Heuslein, BIA Regional Environmental Protection Officer. The BIA's alternate contact will be Mr. Garry Cantley, Regional Archeologist. We would appreciate confirmation from Reclamation with regards to the response to this request. You may respond to the address above and/or call Ms. Heuslein or Mr. Cantley at (602) 379-6750. Currently, the BIA does not have access to electronic mail or the Internet, so we request communications via regular mail delivery or facsimile transmissions. Our telefax number is (602) 379-3833.

The following scoping comments are provided for your consideration in developing the EIS:

1. Along with other applicable laws, regulations, and Executive Orders regarding the government's trust responsibility and tribal rights, please consider addressing Secretarial Order 3206 on American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act during analysis in the EIS.

2. Potentially affected tribal communities should be specifically scoped for this proposed project. It may be necessary to hold public meetings tailored for tribal participation by holding such meetings on their reservations.

3. Consider inviting certain tribes with special technical expertise or jurisdictional control to participate in the NEPA process. Specifically, tribes along the Lower Colorado River system or those tribes with spiritual and religious ties to Glen and Grand Canyons who may have data on the Colorado River ecosystem, special knowledge of cultural resource sites (including Traditional Cultural Properties), and/or other information that could prove highly valuable in the preparation of a successful EIS process.

4. Please also analyze effects to tribally sensitive/important species that may use all or part of the Colorado River ecosystem for their life cycle. These species may not be protected under the Endangered Species Act or other applicable laws, but could be analyzed in regards to cultural significance and effect on the continuance of traditional life ways for specific tribes.

5. Specifically identify all proposed project components and the potentially affected parties in the EIS.

We appreciate your consideration of the above scoping comments and our Cooperating Agency request. If you have any questions, please feel free to contact Ms. Heuslein at (602) 379-6750.

Sincerely,

Acting Regional Director

Regional Director
Bureau of Reclamation
Upper Colorado Region
Attention: UC-402
125 South State Street
Salt Lake City, UT 84318-1147

February 28, 2007

Dear Bureau of Reclamation;

I have several comments to make on the scoping phase of the Long Term Experimental Plan Environmental Impact Statement that is being developed for Glen Canyon Dam operations.

- The National Park Service (NPS) should serve as a joint lead agency for this EIS process. The Grand Canyon Protection Act of 1992 (GCPA) and this EIS are focused on improving and protecting resources and values of Grand Canyon National Park and Glen Canyon National Recreation Area downstream of Glen Canyon Dam. Therefore, National Park Service involvement should be a central component of the LTEP EIS to comprehensively address park values and resource protection over the long term.

- Revaluate whether sufficient funding exists to conduct a Long Term Experimental Plan in the most effective way possible. The level of funding for the AMP was arbitrarily set and then capped early in the development of the program long before operatingprotocols and a Strategic Plan were developed. Enough is known to now adjust the funding according to the true needs of the program.

- Develop a AMP evaluation process whereby outside experts can help a the program to become more effective and operate with a clearer purpose. This could be a panel of experts similar to the Protocol Evaluation Panels utilized by GCMRC.

- Alternatives should be developed that meet the intention of the Grand Canyon Protection Act. Previously, too much concern was placed on AMP activities as they impact perceived hydropower revenues, when this is clearly stated as an incidental benefit of the dam. The Colorado River Basin Fund is set aside for environmental mitigation purposes, and it should be comfortably used for that.

- Follow the scientific method. A primary focus of all alternatives must include an independent review by the Science Advisors as to whether they follow a credible scientific approach that will result in real learning. Alternatives should be logically systematic in their rationale.

- The LTEP should be based on an adaptive ecosystem management approach. The entire ecosystem should be considered when an alternative is developed, with the

knowledge that any action taken will be an action that provides additional learning.

- Alternatives should be in compliance with the Endangered Species Act. Restoration of critical habitat for endangered aquatic species should be given more attention than in the past.

- Alternatives should be in compliance with all existing federal laws in regards to protection of cultural resources and Traditional Cultural Properties, including, but not limited to the National Historic Preservation Act and all associated laws and statutes. It is imperative that the LTEP achieve AMP objectives for these fragile and non-renewable resources to protect National Register listed or eligible historic properties downstream of Glen Canyon Dam.

- Alternatives should comply with existing cultural mandates and management plans. This includes the Cultural Programmatic Agreement the Natural/Cultural and Visitor Use Monitoring Plans currently being developed by Grand Canyon National Park. Mechanisms should be developed for information sharing to eliminate redundancy while ensuring that all program goals and requirements are being met.

- A complete range of scientifically defensible alternatives should be developed, including, but not limited to, the following:

  1) Seasonally Adjusted Steady Flows. At the close of the Glen Canyon Dam EIS, Grand Canyon River Guides did not support the preferred alternative (MLFF) as we were unconvinced that it would best conserve terrestrial riparian habitat in the canyon, especially in regards to crucial sediment needs. We did support a rigorous test of the SASF alternative to determine whether releases that closely mimic pre-dam flows would better restore the endangered species and severely eroded beaches. The single test of SASF in the summer of 2000, although informative, was insufficient to determine its effects on the ecosystem. Further testing of this concept is necessary to assess system response and to test the RPA of the U.S. Fish and Wildlife Service.

  2) Equalized monthly volumes. GCMRC has shown that variation in monthly release volumes strongly affects sediment erosion and deposition. Yet, we still do not know which monthly volume under ROD releases is optimum for sediment sustainability. This is a testable question that should be pursued in the LTEP in order to determine the most effective annual release patterns.

  3) Option “B” from the AMP experimental flow plan. Option B has been vetted by the Science Planning Group and is supported by both Grand Canyon Trust and Grand Canyon River Guides. It adequately tests the SASF hypothesis in a progressive way, which should lead to an understanding of the optimum balance between ecosystem sustainability and hydropower generation.

4) Modified Low Fluctuating Flows The Glen Canyon Dam Record of Decision in 1996 stipulated MLFF flows as the preferred alternative for accomplishing ecosystem goals. Consequently, MLFF should serve as the "base" or "no action" alternative against which all other alternatives can be compared.

- Sediment-triggered and well-defined Beach Habitat Building Flows should be a common element to all alternatives with specified frequency based on the best scientific data. Presently, this is the only dam-operated means to achieve the most important AMP goals. Sediment scientists working on this question have recommended that sediment-triggered BHBF's should be conducted whenever the trigger is met in order to determine if episodic high releases can provide long-term sustainability of sediment in the system, and can deposit the sediment where it is most essential for various ecosystem needs.

- A range of BHBFs should be clearly defined that include alternative timing, magnitudes, and durations. The LTEP should build in some flexibility by testing varying BHBF scenarios rather than being limited to the 41 – 45,000 cfs floods conducted to date. For example if hydrology permits, the LTEP should allow for exceeding those parameters. Although sediment is a profoundly important resource in and of itself, it is also the lynchpin for the health and sustainability of multiple downstream resources. The timing of a BHBF should therefore be carefully evaluated with an eye to maximizing all resource benefits: natural, cultural, and recreational.

- The Selective Withdrawal Structure (Temperature Control Device) should be actively pursued as a common element to all alternatives, providing temperature control flexibility and improved water quality. This structural modification will give the dam much more flexibility in its ability to respond to changing ecosystem concerns in future years, as we learn more about the effects of temperature and water quality from a dynamically-changing reservoir on the downstream environment.

- The LTEP should include a range of options to accommodate minimum, average, and high volume release patterns from Glen Canyon Dam. Although we are presently in a drought, that could well change during the anticipated duration of the LTEP. The LTEP alternatives should include contingencies for a variety of hydrologic basin conditions.

- Alternatives should be integrated with the EIS on drought shortage criteria. LTEP alternatives need to consider the possible constraints of lower monthly or annual release volumes that may result from newly developed criteria for the operation of reservoirs under conditions of long term drought

- Alternatives should be evaluated on the basis of environmental, social (cultural, recreational), and economic criteria.

- Social impacts should be assessed through a Social Impact Assessment process (SIA). Social Impact Assessments are a common element of the EIS process (USDI, 2002). Application of the SIA process will directly address recommendations from two National Resource Council (NRC) reviews and ensure that the social and cultural concerns will be included in the decision making process (NRC, 1987, 1999).

- Economic analyses should incorporate recreational, local and regional economies, non-market values, and hydropower. Currently hydropower revenues are the only economic evaluation conducted within the AMP. The economic evaluation of dam operations and management actions must be broadened to include the economics impacts of the LTEP on recreation, local and regional economies, and non-market values in order to establish a full evaluative framework. This was also a recommendation from both NRC reviews of the program (NRC, 1987, 1999).

Thank you for the opportunity to comment. As a 32 year working Grand Canyon river guide and member of the AMWG, I am very interested in the outcome of this EIS. Best wishes for developing a truly comprehensive and useful set of alternatives.

Sincerely yours,

Andre Potochnik

Andre Potochnik, Ph.D.
18 E Juniper Ave.
Flagstaff, AZ 86001
(928) 774-0698

From: andy hutchinson <andyeehaw@yahoo.com>
To: <GCDExpPlan@uc.usbr.gov>
Date: Wed, Feb 28, 2007 5:09 PM
Subject: Grand Canyon E.I.S. scoping and Long Term Experimental Plan

To Those concernend,

I'm writing as a citizen, tax payer, boatman and lover of Grand Canyon National Park with regard to up-coming review and scoping of proposed E.I.S. study for the downstream ecosystem of the Colo. River through Grand Canyon. I have several areas of concern wich I would like to address and will be brief.

*I beleive the EIS should first and formost be focused on developing alternatives that meet the intent of the Grand Canyon Protection Act for preserving and improving our park values downstream of Glen Canyon Dam; including Native Species, Ecosystems, Plant Values, Sediment, Cultural Rescources, and Visitor Use for all and future generations.

*The L.T.E.P. alternatives must be scientifically credible w/ well-defined hypotheses. We need not to just develop a plan and attempt to fit science to that plan

*The National Park Service should serve as a joint lead agency for this EIS process as the National Park Values are stongly influenced by operations @ the Dam.

*The LTEP should be based on an ecosystem approach that builds on facts we are currently aware of and that have been defined.

*Support an ongoing Beach Habitat building Flow, based on sediment data.

Thank You, Andy Hutchinson
P.O. Box 473
Dolores, CO 81323 andyeehaw@yahoo.com

From: <denali@fone.net>
To: <GCDExpPlan@uc.usbr.gov>
Date: Wed, Jan 31, 2007 3:46 PM
Subject: LTEP EIS Scoping Comments

Dear Mr. Gold,

Thank you for the opportunity to submit the following scoping comments for the Environmental Impact Statement on the Long-term Operations for the future operations of Glen Canyon Dam. The river ecosystem in Grand Canyon National Park has suffered immensely over the past forty years due to the operations of Glen Canyon Dam, and it's vital that a fresh look at the problem be undertaken. I have concerns, however, that the EIS as envisioned is destined to fail in this regard unless a number of critical issues are addressed.

First, I would like to express my tremendous dismay with the Department of Interior's mishandling of the recovery efforts in Grand Canyon National Park over the past 40 years, and that the information presented so far by the Bureau of Reclamation indicates that this EIS promises more of the same.

While new plans for ongoing investigation and experimentation can be beneficial, they are useless amidst a backdrop where the commitment to implement those plans is virtually non-existent. We've already experienced this with the completion of the first EIS twelve years ago, and there's nothing outlined in the purpose and need for this EIS process to indicate things will be any different once this process concludes. For this exercise to yield any meaningful outcome, the EIS process must be reconceived incorporating the following:

1. Restructuring the focus of the EIS on the recovery.

The principal objective should not be the long-term operation of Glen Canyon Dam, but the ingredients necessary to bring about the recovery and preservation of endangered species within the Colorado River corridor of Grand Canyon National Park. While such objectives may not be mutually exclusive, this has yet to be proven, and as such, one should precede the other. The focus must first address the ingredients necessary to restore the natural process to Grand Canyon's river ecosystem, and secondly how, and at what costs, can the Glen Canyon Dam/Lake Powell reservoir system be operated in order to achieve this. The restoration ingredients must include:

The return of river flows consistent with the Colorado River's natural discharge into Grand Canyon.

The re-establishment of a water temperature regime consistent with seasonal temperature variations of the Colorado River in Grand Canyon.

The re-establishment of sediment inputs into Grand Canyon consistent with the amount that would be received in a dam-free environment.

The elimination of non-native species, which have taken hold in the artificial riverine environment created by Glen Canyon Dam operations.

2. Evaluate the Decommissioning of Glen Canyon Dam.

The no-dam alternative must be evaluated as one means of achieving the restoration of the natural process necessary for the recovery and preservation of endangered species in Grand Canyon's river corridor. The no-dam alternative provides a valuable base line from which to evaluate other operational alternatives. Additionally, in light of the climate and human induced changes affecting flows into Lake Powell, and thus the viability of the dam to meet perceived water supply and hydroelectric benefits, BoR has additional incentive to examine a decommissioning or no-dam alternative consistent with the Council on Environmental Quality guidelines.

3. Replace the Working Groups of the Adaptive Management Program

Despite being given specific instructions twelve years ago as outlined in the 1995 EIS on Glen Canyon Dam operations, the Glen Canyon Dam Adaptive Management Program (AMP) has failed to deliver in almost every aspect, causing Grand Canyon's river ecosystem to endure further damage. Many of AMP's failings were spelled out in the United State's Geological Survey's SCORE Report of October 2005. It was precisely these failings that have compelled BoR to undertake this new EIS process as part of its settlement agreement with environmental groups last year. Absent any structural changes to the AMP, any recommendations coming out of this EIS process will be of little value, as there are no mechanisms to ensure they won't be ignored as were those from the EIS twelve years ago.

Dominated by water supply and hydroelectric power interests, it's not surprising that the AMP has been intransigent toward addressing the true needs for endangered species recovery in Grand Canyon. Scientific, not political and commercial interests, should be the sole advisors to the Secretary ofInterior on how Grand Canyon's river ecosystem should be studied, monitored and managed consistent with the recovery objectives.

Therefore, the AMP should be replaced by an open source and independent body of research and advisory scientists, where the monitoring and research data are consistently and thoroughly peer-reviewed prior to formulating any recommendations to the Secretary of Interior.

We're closing in on 50 years of ecological destruction in Grand Canyon National Park due to the operations of Glen Canyon Dam. For much of this time the public has been asking that this be remedied. We continue to lose valuable time and species as the BoR procrastinates and resists the public's mandate to put the resource first. While there are plenty of substitutes to achieve the benefits Glen Canyon Dam may provide, there will never be another Grand Canyon. It's time for the BoR to stop thwarting the public's interest to protect it.

Sincerely,

Angi Sauk
Cortez, Colorado

Angi Sauk
415 N Ash St.
Cortez, Co 81321

CC: <ltepcomments@livingrivers.org>

SHPO-2004-0344 (31575) GC

United States Department of the Interior

BUREAU OF RECLAMATION
Upper Colorado Regional Office
125 South State Street, Room 6107
Salt Lake City, Utah 84138-1147

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:
UC-402
ENV-6.00

DEC 12 2006

RECEIVED
DEC 18 2006
12/18/06

Subject: Environmental Impact Statement (EIS) for the Adoption of a Long-Term Experimental Plan for the Future Operation of Glen Canyon Dam and Other Associated Management Activities

Dear Interested Party:

In a notice published in the *Federal Register* on November 6, 2006 (copy enclosed), the Bureau of Reclamation announced its intent to prepare an EIS on the adoption of a Long-Term Experimental Plan for the future operation of Glen Canyon Dam and other associated management activities. The purpose of the Long-Term Experimental Plan is to increase understanding of the ecosystem downstream from Glen Canyon Dam and to improve and protect important downstream resources. The proposed plan would implement a structured, long-term program of experimentation (including dam operations, potential modifications to Glen Canyon Dam intake structures, and other potential management actions, such as removal of non-native fish species) in the Colorado River below Glen Canyon Dam.

As part of this National Environmental Policy Act (NEPA) process, Reclamation intends to incorporate information gathered during the scoping process conducted for the environmental assessment for construction of a temperature control device at Glen Canyon Dam. The environmental impacts of constructing and operating a temperature control device at Glen Canyon Dam will now be analyzed in this new NEPA process.

If you would like us to add your name to our mailing list for the Long-Term Experimental Plan EIS, or if you would like to provide comments on the scope of analysis or the issues and alternatives to be analyzed during this NEPA process, **please fill out the enclosed comment card and return it to us no later than Wednesday, February 28, 2007**.

In a subsequent notice published in the *Federal Register* on December 12, 2006, Reclamation provided information on upcoming public scoping meetings, the proposed federal action, the purpose and need for the proposed action, and additional background on the Long-Term Experimental Plan. A copy of that notice is also enclosed for your use.

Two public scoping meetings will be held to solicit comments on the scope of the Long-Term Experimental Plan and the issues and alternatives that should be analyzed. The meetings will serve to expand upon the input received from Glen Canyon Dam Adaptive Management Program meetings and the recommendations of the Adaptive Management Work Group (AMWG), a federal advisory committee. In addition, Reclamation will utilize information

developed through prior meetings of the AMWG, Technical Work Group, and Science Planning Group as relevant information for the purposes of scoping the upcoming NEPA process and to develop the appropriate scope of analysis. The scoping meetings will be held at the following locations:

Thursday, January 4, 2007 – 6:00 p.m. to 8:00 p.m., Embassy Suites Phoenix Airport at 44th Street, 1515 North 44th Street, Cholla Room, Phoenix, Arizona.

Friday, January 5, 2007 – 6:00 p.m. to 8:00 p.m., Hilton Salt Lake City Center, 255 South West Temple, Salon 1, Salt Lake City, Utah.

Written comments on the proposed development of the Long-Term Experimental Plan may be sent by close of business on **Wednesday, February 28, 2007**, to: Regional Director, Bureau of Reclamation, Upper Colorado Region, Attention: UC-402, 125 South State Street, Salt Lake City, Utah 84138-1147, faxogram at 801-524-3858, or e-mail at GCDExpPlan@uc.usbr.gov.

A project fact sheet is also enclosed to provide you with additional information about this project. If you have any questions or would like more information about this NEPA process, please contact Mr. Dennis Kubly, Bureau of Reclamation at 801-524-3715, faxogram 801-524-3858, or e-mail at GCDExpPlan@uc.usbr.gov. Information about this EIS will be posted to the project website at: http://www.usbr.gov/uc/rm/gcdltep/index.html.

Sincerely yours,

Acting for

Rick L. Gold
Regional Director

Enclosures - 4

We look forward to reviewing the Agency's Section 106 Consultation on this undertaking.
Ann W. Howard 1/16/07
for AZSHPO

From: <browerb@pdx.edu>
To: <GCDExpPlan@uc.usbr.gov>
Date: Wed, Feb 28, 2007 5:19 PM
Subject: Glen Canyon dam

February 24, 2007

Mr. Rick Gold
Regional Director, Bureau of Reclamation
Upper Colorado Region
Attn: UC-402
125 South State Street
Salt Lake City, Utah 84138-1147

Dear Mr. Gold

It is clear that a review of the operations of Glen Canyon Dam is seriously overdue. The conditions that obtained when the dam was planned and built have changed substantially. Not only are the Colorado River basin states very different places today from what they were in the 1950s; the whole world has changed in ways that directly influence the considerations that must be weighed in river and reservoir management.

The evidence is unassailable that we are heading for a prolonged period of climate change; the likeliest effect on the West is overall warming and a shift in precipitation regimes that is likely to mean earlier, perhaps more intense run-off and less water overall in the Colorado system. Yet everything we are asking the Colorado River to do for us?irrigate our fields, fill our bathtubs, generate power, harbor biological diversity, provide recreation, and present to the world the best-known, best-loved spectacle of the American landscape?depends on river-delivered water, and becomes more challenging in the face of the warmer, dried West to come.

We can hope that a new commitment to energy and water conservation, coupled with increasingly efficient, sustainable, and region-appropriate technologies, can reduce the demand for water and energy. The Bureau has seen its responsibility primary in terms of meeting these needs, provided by a tamed river, for the West. Understanding and providing for the values provided by a wild river have been less central to your bureau?s mission. But by servicing utilitarian demands through its management of the Colorado, the Bureau of Reclamation has neglected, and too often compromised, the other values we demand from our river: its uniquely beautiful landscapes and habitats, its wild rapids, its capacity?as a free-flowing river?to remind us of what makes America great, including our foresight in protecting the truly spectacular wonders Nature has provided this country.

I would ask that the protecting and enhancing the properties of natural river systems be first, not last, on the list of Bureau of Reclamation priorities in the management of Glen Canyon Dam.

It was my great good fortune to spend some time in Glen Canyon before the reservoir drowned it, and while I do not hope to see again those

sinuous side-canyons alive with riparian life, to be enjoyed again as we did in 1963, the Bureau should consider how Lake Powell?s lowering level might allow for some return to the habitats and undeveloped, nature-based recreation enjoyed before and below the dam.

I was lucky again last year in making my first trip down Grand Canyon?s stretch of the Colorado. What I saw for myself, there, is what I had read about: the ecological systems of the river downstream from Lake Powell are severely degraded as a consequence of the interrupted flow of water and sediment. Native fishes are in serious jeopardy, beaches are all but gone?yet the Bureau?s own experiments showed that some degree of restoration is possible through manipulations of releases from the dam.

Let a return to a functional river system be the goal that guides Bureau planning for the Colorado. Rivers know best how to do their work. All over the US dams are coming down as we realize the costs of trying to contain fluvial systems that require free-flowing water. It may not be the moment for the Colorado?s dams to come down, but they all?and certainly Glen Canyon Dam?can be managed so as to work with instead of against the river, to restore rather than destroy the natural systems?and ultimately the human society?that depends on free-flowing water.

Sincerely,

Barbara Brower, Professor
Geography Department
Portland State University
Portland, OR 97207-0751

]

From: <bbickel@ecoisp.com>
To: <GCDExpPlan@uc.usbr.gov>
Date: Tue, Jan 30, 2007 5:56 PM
Subject: LTEP EIS Scoping Comments

Dear Mr. Gold,

Thank you for the opportunity to submit the following scoping comments for the Environmental Impact Statement on the Long-term Operations for the future operations of Glen Canyon Dam. The river ecosystem in Grand Canyon National Park has suffered immensely over the past forty years due to the operations of Glen Canyon Dam, and it's vital that a fresh look at the problem be undertaken. I have concerns, however, that the EIS as envisioned is destined to fail in this regard unless a number of critical issues are addressed.

First, I would like to express my tremendous dismay with the Department of Interior's mishandling of the recovery efforts in Grand Canyon National Park over the past 40 years, and that the information presented so far by the Bureau of Reclamation indicates that this EIS promises more of the same.

While new plans for ongoing investigation and experimentation can be beneficial, they are useless amidst a backdrop where the commitment to implement those plans is virtually non-existent. We've already experienced this with the completion of the first EIS twelve years ago, and there's nothing outlined in the purpose and need for this EIS process to indicate things will be any different once this process concludes. For this exercise to yield any meaningful outcome, the EIS process must be reconceived incorporating the following:

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3. Replace the Working Groups of the Adaptive Management Program.

Despite being given specific instructions twelve years ago as outlined in the 1995 EIS on Glen Canyon Dam operations, the Glen Canyon Dam Adaptive Management Program (AMP) has failed to deliver in almost every aspect, causing Grand Canyon's river ecosystem to endure further damage. Many of AMP's failings were spelled out in the United State's Geological Survey's SCORE Report of October 2005. It was precisely these failings that have compelled BoR to undertake this new EIS process as part of its settlement agreement with environmental groups last year. Absent any structural changes to the AMP, any recommendations coming out of this EIS process will be of little value, as there are no mechanisms to ensure they won't be ignored as were those from the EIS twelve years ago.

Dominated by water supply and hydroelectric power interests, it's not surprising that the AMP has been intransigent toward addressing the true needs for endangered species recovery in Grand Canyon. Scientific, not political and commercial interests, should be the sole advisors to the Secretary ofInterior on how Grand Canyon's river ecosystem should be studied, monitored and managed consistent with the recovery objectives.

Therefore, the AMP should be replaced by an open source and independent body of research and advisory scientists, where the monitoring and research data are consistently and thoroughly peer-reviewed prior to formulating any recommendations to the Secretary of Interior.

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Sincerely,

Bettina Bickel
9218 N. 51st Dr.
Glendale, AZ 85302

CC: <bbickel@ecoisp.com>, <ltepcomments@livingrivers.org>

From: Bill Victor <wrvictor@yahoo.com>
To: <GCDExpPlan@uc.usbr.gov>
Date: Wed, Feb 28, 2007 2:27 PM
Subject: Scoping Comments on Development of Alternatives for LTEP EIS

Regional Director Bureau of Reclamation
Upper Colorado Region
Attention: UC-402
125 South State Street
Salt Lake City, UT 84318-1147

RE: Scoping Comments on Development of Alternatives for a Long Term Experimental Plan Environmental Impact Statement

Dear Regional Director:

Grand Canyon Private Boaters Association (GCPBA) appreciates the opportunity to submit the attached comments on the Environmental Impact Statement (EIS) for the Long Term Experimental Plan (LTEP) for operations of Glen Canyon Dam and other associated management activities.

Respectfully submitted,
Grand Canyon Private Boaters Association

CC: <BoardListGCPBA@yahoogroups.com>

THE GRAND CANYON PRIVATE BOATERS ASSOCIATION
809 W. RIORDAN ROAD
SUITE 100, #431
FLAGSTAFF, AZ 86001

February 28, 2007

Regional Director
Bureau of Reclamation
Upper Colorado Region
Attention: UC-402
125 South State Street
Salt Lake City, UT 84318-1147

RE: SCOPING COMMENTS ON DEVELOPMENT OF ALTERNATIVES FOR A LONG TERM EXPERIMENTAL PLAN ENVIRONMENTAL IMPACT STATEMENT

Dear Regional Director:

Grand Canyon Private Boaters Association (GCPBA) was founded in 1996 to provide a voice for the non-commercial boating community in Grand Canyon. Our organization is currently comprised of more than 450 members. We are a non-profit 501(c)(3) organization, whose stated purpose is to:

Promote, encourage, and advocate for the interests of the non-commercial boating community on the river, particularly (but not limited to) access issues involving the Colorado River in the Grand Canyon

Our membership is directly affected by and cares strongly about the impacts to the environmental, cultural, and recreational resources downstream from Glen Canyon Dam, including operation of the dam. Therefore, on behalf of the interests of our membership, we offer the following comments on the Environmental Impact Statement (EIS) for the Long Term Experimental Plan (LTEP) for operations of Glen Canyon Dam and other associated management activities.

GENERAL COMMENTS

1. **The National Park Service (NPS) should serve as a joint lead agency for the LTEP EIS process.** The Grand Canyon Protection Act of 1992 (GCPA) and this EIS are focused on improving and protecting resources and values of Grand Canyon National Park and Glen Canyon National Recreation Area downstream of Glen Canyon Dam. Therefore, NPS involvement should be a

central component of the LTEP EIS to comprehensively address park values and resource protection over the long term.

2. **The LTEP should serve to re-focus the Adaptive Management Program (AMP) and Department of Interior on ecosystem resources, not program administration.** Grand Canyon Private Boaters Association regrets the recent decision by the Secretary of the Interior to cancel a proposed Beach Habitat Building Flow (BHBF). In his memorandum of February 02, 2007, the Secretary's Designee outlined several reasons for cancellation of the BHBF. We were dismayed to find that the justification for not implementing a BHBF only involved the need for further planning, compliance and review. No mention was made of the need to protect, mitigate adverse impacts to, and improve resources of the Colorado River in Grand Canyon. Monitoring and research has clearly demonstrated that Beach Habitat Building Flows are the only viable mechanism for conserving sediment in the system, and sediment conservation has been identified as a priority resource that has significantly declined. We are concerned that this decision may have been based solely on administrative criteria, rather than critical resource conditions and needs. We disagree with this decision. The LTEP EIS process should serve as a mechanism for re-focusing the decision-making process on responding adaptively to resource conditions based on what we already know, rather than being inhibited by program administration or policy. Sound science should inform and direct policy decisions.

3. **Funding mechanisms for the AMP should be reevaluated to ensure the effects of the LTEP are meeting the intent of the GCPA.** The level of funding available for monitoring, research and program administration has hindered the ability of the AMP to properly evaluate whether the effects of Glen Canyon Dam operations and other management activities are meeting the intent of the GCPA. The information needs, management objectives and goals of the AMP have been prioritized, based in part, on the amount of money available. Recent planning efforts for the proposed BHBF were guided by the amount of funds available in the Experimental Flow Fund. What happens to the program if there are insufficient funds in the Basin Fund to cover AMP expenditures? New funding mechanisms should be investigated that ensure sufficient funding to evaluate the effects of the preferred LTEP alternative on meeting the intent of the Grand Canyon Protection Act.

4. **Investigate the structure and implementation of the adaptive management process.** The Glen Canyon Dam AMP is an experiment of national importance. Yet, there is not a current assessment on the effectiveness of the program. How can the Glen Canyon Adaptive Management program be

improved? Where has the program succeeded? Where has it failed (see BHBF comments above) and what are the impediments? How can the structure of the program be improved to better meet the Adaptive Management Work Group (AMWG) charter and the mandates of the Grand Canyon Protection Act? The Department of Interior should initiate an assessment program, perhaps a panel of experts similar to the Protocol Evaluation process used by Grand Canyon Monitoring and Research Center (GCMRC), to ensure that the outcome of this EIS is implemented in the most effective way.

DEVELOPMENT OF ALTERNATIVES

5. **The LTEP should include and evaluate an alternative that provides sediment from the San Juan River and Upper Colorado arms of Lake Powell to the stilling basin below Glen Canyon Dam**. Current attempts to protect ecological and cultural resources via manipulation of the sediment supplied by the Paria and Little Colorado Rivers have proved inadequate and need supplementation via an alternative that will supply enough sediment to restore the natural conditions of the Colorado River corridor, while prolonging the life of Lake Powell. Failure to provide for sediment supplementation risks non-compliance with the Grand Canyon Protection Act of 1992.

6. **Alternatives should be developed that meet the intention of the Grand Canyon Protection Act.** The GCPA stipulates that the protection of downstream environmental, cultural and recreational values have precedent over power generation as long as operations do not interfere with the allocation of water governed by the Law of the River. In Section VII (Basis of Decision) the 1996 Record of Decision (ROD) for the Glen Canyon Dam EIS states, *"The goal of selecting a preferred alternative was not to maximize benefits for the most resources, but rather to find an alternative dam operating plan that would permit recovery and long-term sustainability of downstream resources while limiting hydropower capability and flexibility only to the extent necessary to achieve recovery and long term sustainability."* We recommend a similar approach for the LTEP.

7. **All LTEP alternatives must be scientifically credible and defensible with well-defined scientific hypotheses**. The Adaptive Management Program, and therefore the LTEP, must provide a scientifically credible framework to continually refine, and if necessary modify operation of Glen Canyon Dam so

as to meet the primary intent of the GCPA, to develop a systematic and improved understanding of the dam's effects on downstream resources.

8. **The LTEP should be based on an adaptive ecosystem management approach.** Adaptive management should build upon knowledge previously gained through extensive monitoring, modeling, and research that adheres with Principle 4 of the AMP Strategic Plan.

9. **Alternatives should be in compliance with the Endangered Species Act.** The Endangered Species Act focuses on preserving and restoring native species in the context of their critical habitat, which in this case, is inextricably affected by a dam-altered system.

10. **Alternatives should be in compliance with all existing federal laws in regards to protection of cultural resources and Traditional Cultural Properties, including, but not limited to the National Historic Preservation Act and all associated laws and statutes.** It is imperative that the LTEP achieve AMP objectives for these fragile and non-renewable resources to protect National Register listed or eligible historic properties downstream of Glen Canyon Dam.

11. **LTEP alternatives should comply with the Cultural Programmatic Agreement for the AMP as well as the Natural/Cultural and Visitor Use Monitoring Plans currently being developed by Grand Canyon National Park.** Mechanisms should be developed for information sharing to eliminate redundancy while ensuring that all program goals and requirements are being met.

12. **A complete range (full spectrum) of scientifically defensible alternatives should be developed, including, but not limited to, the following:**

    A. **Seasonally Adjusted Steady Flows (SASF).** Grand Canyon Private Boaters Association is not convinced that the preferred alternative (Modified Low Fluctuating Flows, or MLFF) of the Glen Canyon Dam EIS will best conserve terrestrial riparian habitat in the canyon, especially in regards to crucial sediment needs. We do support a rigorous test of the SASF alternative to determine if releases that closely mimic pre-dam flows would better restore the endangered species and severely eroded beaches. The single test of SASF in the summer of 2000, although informative, was insufficient to determine its effects on the ecosystem. Further testing of this concept is necessary to assess system response and to test the RPA of the U.S. Fish and Wildlife Service.

THE GRAND CANYON PRIVATE BOATERS ASSOCIATION
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B. **Equalized monthly volumes.** GCMRC has shown that variation in monthly release volumes strongly affects sediment erosion and deposition. Yet, we still do not know which monthly volume under ROD releases is optimum for sediment sustainability. This is a testable question that should be pursued in the LTEP in order to determine the most effective annual release patterns.

C. **Option "B" from the AMP experimental flow plan.** Option B has been vetted by the Science Planning Group and is supported by Grand Canyon Trust, Grand Canyon River Guides, and Grand Canyon Private Boaters Association. It adequately tests the SASF hypothesis in a progressive way, which should lead to an understanding of the optimum balance between ecosystem sustainability and hydropower generation.

D. **Modified Low Fluctuating Flows** The Glen Canyon Dam Record of Decision in 1996 stipulated MLFF as the preferred alternative for accomplishing ecosystem goals. Consequently, MLFF should serve as the "base" or "no action" alternative against which all other alternatives can be compared.

13. **Sediment-triggered and well-defined Beach Habitat Building Flows should be a common element to all alternatives with specified frequency based on the best scientific data.** Presently, this is the only dam-operated means to achieve the most important AMP goals. Sediment scientists working on this question have recommended that sediment-triggered BHBF's should be conducted whenever the trigger is met in order to determine if episodic high releases can provide long-term sustainability of sediment in the system, and can deposit the sediment where it is most essential for various ecosystem needs.

14. **A range of BHBF's should be clearly defined that include alternative timing, magnitudes, and durations.** The LTEP should build in some flexibility by testing varying BHBF scenarios rather than being limited to the 41,000 to 45,000 cubic feet per second (cfs) floods conducted to date. For example, if hydrologic conditions permit, the LTEP should allow for exceeding those parameters. Although sediment is a profoundly important resource in and of itself, it is also the lynchpin for the health and sustainability of multiple downstream resources. The timing of a BHBF should therefore be carefully evaluated with an eye to maximizing all resource benefits: natural; cultural; and recreational.

15. **The Selective Withdrawal Structure (Temperature Control Device) should be actively pursued as a common element to all alternatives, providing temperature control flexibility and improved water quality.** This structural modification will give the dam much more flexibility in its ability to respond to changing ecosystem concerns in future years, as we learn more about the effects of temperature and water quality from a dynamically-changing reservoir on the downstream environment.

16. **The LTEP should include a range of options to accommodate minimum, average, and high volume release patterns from Glen Canyon Dam.** Although we are presently in a drought, these relatively short-term climatic conditions could change during the anticipated duration of the LTEP. Therefore, LTEP alternatives should include contingencies for a variety of hydrologic basin conditions.

17. **Alternatives should be integrated with the EIS on drought water-shortage criteria.** LTEP alternatives need to consider the possible constraints of lower monthly or annual release volumes that may result from newly developed criteria for the operation of reservoirs under conditions of long-term drought.

EVALUATION OF ALTERNATIVES

18. **Alternatives should be evaluated on the basis of environmental, social (cultural, recreational), and economic criteria.**

19. **Environmental evaluation should be based on an ecosystem approach.**

20. **Social impacts should be assessed through a Social Impact Assessment process (SIA).** Social Impact Assessments are a common element of the EIS process (USDI, 2002). Application of the SIA process will directly address recommendations from two National Research Council (NRC) reviews and ensure that the social and cultural concerns will be included in the decision-making process (NRC, 1987 and 1999).

21. **Economic analyses should incorporate local and regional economies, non-market values, and hydropower.** Currently, hydropower revenues are the only economic evaluation conducted within the AMP. The economic evaluation of dam operations and management actions must be broadened to include the economic impacts of the LTEP on local and regional economies,

and non-market values in order to establish a full evaluative framework. This was also a recommendation from both NRC reviews of the program (NRC, 1987 and 1999).

SUMMARY

Grand Canyon Private Boaters Association appreciates the opportunity to provide input for this public process. The breadth, quality, and scientific integrity of the LTEP alternatives will guide dam management for years to come, and could potentially lead to a new ROD and modification of dam operation. This LTEP should therefore serve as the catalyst for refocusing the AMP on an adaptive ecosystem management approach that seeks to

"...protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use."
(Grand Canyon Protection Act, Section 1802a, 1992)

There are many opportunities presented by the LTEP: to evaluate the effectiveness of the AMP, to craft scientifically credible and defensible alternatives that comply with all existing laws and policies, and to institute rigorous and well-rounded evaluation criteria, while vigilantly adhering to the preservation of park resources and values.

The ultimate goal of the LTEP should be to advance us further along the science-based learning curve towards long-term sustainability for the cultural, natural, and recreational resources of the Colorado River corridor downstream of Glen Canyon Dam.

REFERENCES CITED

National Research Council, Commission of Geosciences, Environment, and Resources, Water Science and Technology Board, *Committee to Review the Glen Canyon Environmental Studies*, 1987, ***River and Dam Management: A Review of the Bureau of Reclamation's Glen Canyon Environmental Studies***: Washington DC, National Academy Press.

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National Research Council, Commission on Geosciences, Environment, and Resources, Water Science and Technology Board, *Committee on Grand Canyon Monitoring and Research*, 1999, ***Downstream: Adaptive Management of Glen Canyon Dam and the Colorado River Ecosystem***: Washington DC, National Academy Press.

US Bureau of Reclamation (USDI), 2002, ***Social Analysis Manual Volume I: Manager's Guide to Using Social Analysis***; Volume II Social Analyst's Guide to Doing Social Analysis (Resource Management and Planning Group, Technical Service Center, Denver Federal Center D-8580, Bldg. 67. Denver, CO 80225-0007).

Respectfully submitted,

Grand Canyon Private Boaters Association
809 West Riordan Road
Suite 100, #431
Flagstaff, AZ 86001
president@gcpba.org
www.gcpba.org

SENT VIA FACSIMILE TO: 801-524-3858
AND EMAIL TO: GCDExpPlan@uc.usbr.gov

From: <bbrister@greens.org>
To: <GCDExpPlan@uc.usbr.gov>
Date: Thu, Jan 25, 2007 7:25 PM
Subject: LTEP EIS Scoping Comments

Dear Mr. Gold,

I'm very concerned about the ecological deterioration of the Colorado River since the building of the Glen Canyon Dam. Please do not continue experiments with dam flows. Decommission Glen Canyon Dam and let the Colorado River run free. Uncover Glen Canyon. Its recovery will be a huge tourist draw. I'm all for restoring and preserving Grand Canyon's unique river ecosystem.

Sincerely,

Bob Brister

Bob Brister
1102 S 800 E #A
Salt Lake City, UT 84105

CC: <bbrister@greens.org>, <ltepcomments@livingrivers.org>

RECLAMATION
Managing Water in the West

U.S. Department of the Interior
Bureau of Reclamation

— Comment Card —

COMMENTS DUE BY WEDNESDAY, FEBRUARY 28, 2007

PLEASE PRINT

Date: Dec. 20, 2006

Name: Bob Brister Title (if applicable) :

Telephone: 801-363-0898 Fax:

Organization/Business (if applicable): E-Mail: bbrister@greens.org

Address: 1102 S. 800 E. #A

City: Salt Lake City State: UT Zip: 84105

☑ Yes, I would like to be added to your mailing list: E-Mail ☑ US Mail ☐

The Bureau of Reclamation is seeking public comment on the adoption of a Long-Term Experimental Plan for the future operation of Glen Canyon Dam and other associated management activities. Your input on the scope of the project and the issues and alternatives that should be analyzed is greatly appreciated. Please write legibly.

Decommission Glen Canyon Dam and let the Colorado River run free.

Please submit your comments in the space provided, fold the card in half, tape the edges, and mail the completed card back to:
Regional Director, Bureau of Reclamation, Upper Colorado Region, Attention: UC-402, 125 South State Street, Salt Lake City, Utah 84138-1147.
Comments must be received by February 28, 2007.

ad030607.04

ORIGINAL

THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT
2221 WEST GREENWAY ROAD
PHOENIX, AZ 85023-4399
(602) 942-3000 • AZGFD.GOV

February 28, 2007

Regional Director, USBR, Upper Colorado River Region
Attn.: UC-402
125 South State Street
Salt Lake City, Utah 84138-1147

Re: Environmental Impact Statement (EIS) for the Adoption of a Long-term Experimental Plan for the Future Operation of Glen Canyon Dam and other Associated Management Activities

Dear Regional Director:

The Arizona Game and Fish Department (Department) recently sent you a letter requesting cooperator status on the preparation of an EIS for the adoption of a long-term experimental plan for future operation of Glen Canyon Dam. We appreciated your response inviting us into the process as a cooperator. As part of the scoping process in preparation of this EIS under the National Environmental Protection Act (NEPA), the Department is providing the following comments and concerns as issues and alternatives that should be analyzed.

The Colorado River, including Glen Canyon National Recreation Area and Grand Canyon National Park, contain important biological and recreational resources to the State of Arizona. The Department maintains statutory authority and responsibility for the fish and wildlife resources in the Colorado River. Consistent with that authority, the Department participated as a Cooperating Agency in development of the 1996 Operation of Glen Canyon Dam Environmental Impact Statement, and continues to participate in the Glen Canyon Dam Adaptive Management Program. We intend to maintain this level of coordination with the Bureau during the development of this EIS.

We support the recommendation of the Adaptive Management Work Group that the alternatives maintain a balance of benefits to all resources as described in the Record of Decision, while concentrating on humpback chub and sediment resources. We agree that experimentation should include construction and testing of a Temperature Control Device Structure on Glen Canyon Dam that provides the opportunity to conduct structured experiments with regard to dam release temperatures. A range of flow experiments should also be tested, in conjunction with temperature tests, to assess impacts to downstream resources and hydropower production.

In addition, other non-flow options should be incorporated into the experimentation, including evaluating the impact of trout control on native fishes near the mouth of the Little Colorado River. Prior to conducting any experimental treatments, we feel strongly that sufficient

humpback chub numbers should be held in a refuge to protect against catastrophic population losses. Although we believe a Temperature Control Structure has potential to provide great benefit to humpback chub and other native fishes, it also carries some risk.

Other resources, as identified in the GCD EIS, should be considered and alternatives should try and maintain a balance of benefits to those resources. Overall, we urge that the process to develop an experimental plan be open, transparent, and independent. The resulting preferred alternative should contain a sound experimental plan that can withstand rigorous scientific review. It should also present the possible risks of any alternative to better inform policy makers.

The Department recommends that the Bureau complete necessary compliance documentation under the Fish and Wildlife Coordination Act (FWCA) to ensure that impacts to all fish and wildlife resources are addressed pursuant to NEPA EIS planning needs. In cooperation with the Department and the U.S. Fish and Wildlife Service, a FWCA report is needed to ensure that all public natural resources are addressed especially in regard to rainbow trout fishery management and humpback chub needs.

We appreciate the opportunity to cooperate with you on the development of this EIS. Should you have any questions regarding this letter, please contact Mr. Bill Persons at (602) 789-3375.

Sincerely,

Bob Broscheid, Assistant Director
Wildlife Management Division

BB:dw

cc: Chantal O'Brien, Research Chief
Larry Riley, Fisheries Chief
Eric Gardner, Nongame Chief
Ron Sieg, Regional Supervisor, Region II, Flagstaff
Josh Avey, Habitat Chief

RECLAMATION
Managing Water in the West

U.S. Department of the Interior
Bureau of Reclamation

— Comment Card —

COMMENTS DUE BY WEDNESDAY, FEBRUARY 28, 2007

PLEASE PRINT

Date: 1/14/2007

Name: BOB SPALY Title (if applicable):

Telephone: 602-390-2043 Fax: 866-812-2240

Organization/Business (if applicable): 4X OUTFITTERS E-Mail: FOURXOUTFITTER@QWEST.NET

Address: 4401 E. KATHLEEN RD.

City: PHOENIX State: AZ Zip: 85032

☑ Yes, I would like to be added to your mailing list: E-Mail ☐ US Mail ☑

The Bureau of Reclamation is seeking public comment on the adoption of a Long-Term Experimental Plan for the future operation of Glen Canyon Dam and other associated management activities. Your input on the scope of the project and the issues and alternatives that should be analyzed is greatly appreciated. Please write legibly.

AS A COMPANY WHICH MAKES ITS LIVING WITH THE FISHING IN ARIZONA WITH RETAIL AND GUIDING CLIENTS PROTECTING THE RAINBOW TROUT FISHERY FROM GLEN CANYON DAM DOWN RIVER IS PARAMOUNT. LOSING THIS RAINBOW TROUT FISHERY WOULD BE DETRIMENTAL TO LOCAL RETAILERS AS WELL AS HAVE GREAT EFFECT ON PHOENIX BASED BUSINESSES. THERE ARE MANY OUT OF STATE OUTDOORSMAN WHICH WILL GO SOMEWHERE ELSE (ANOTHER STATE) TO FISH SUCH AN EXCELLENT TAIL WATER FISHERY. FROM AN ECONOMIC STAND POINT, HOTELS, RESTAURANTS, CAR RENTAL, SPORT SHOP AND MANY OTHER RETAIL STORES WILL SUFFER WITH THE DROP IN REVENUE.

PLEASE CONSIDER THE RAINBOW TROUT FISHERY IN ALL OF THE DECISIONS THAT ARE MADE ABOUT THIS TAIL WATER FISHERY. PLEASE CONTACT ME WITH ANY QUESTIONS YOU MAY HAVE.

BOB SPALY

Please submit your comments in the space provided, fold the card in half, tape the edges, and mail the completed card back to: Regional Director, Bureau of Reclamation, Upper Colorado Region, Attention: UC-402, 125 South State Street, Salt Lake City, Utah 84138-1147. **Comments must be received by February 28, 2007.**

ORIGINAL

Brian Rogers
30453 East 165th Avenue
Brighton, CO 80603
(303) 659-4800 Voice (720) 685-0444 Fax

Saturday, February 03, 2007

Mr. Rick Gold
Regional Director, Bureau of Reclamation
Upper Colorado Region
Attn: UC-402
125 South State Street
Salt Lake City, Utah 84138-1147

Fax: (801) 524-3858
E-mail: GCDExpPlan@uc.usbr.gov

Re: New Environmental Impact Study Underway on Glen Canyon Dam Operations

Dear Mr. Rick Gold

In an attempt to comply with a settlement agreement reached last September between environmental groups and the Department of Interior, the Bureau of Reclamation has begun the scoping process for an Environmental Impact Statement on the operations of Glen Canyon Dam called the Long-Term Experimental Plan.

As presently conceived, this EIS will deliver nothing more than a continuation of studying Grand Canyon to death.

Your voice is needed to expose this fallacy and redirect the EIS away from experimentation aimed at preserving endangered species in the Grand Canyon, which are present elsewhere in the Colorado River, and toward action in containing and for study the eradication of Quagga Mussels recently detected in Lake Mead and Havasau- and protect the Colorado River's ecosystem.

Sincerely,

Brian Rogers
30453 E. 165th Ave.
Brighton, CO 80603

From: <reed13@comcast.net>
To: <GCDExpPlan@uc.usbr.gov>
Date: Fri, Feb 23, 2007 3:36 AM
Subject: Bruce Reed

Mr. Rick Gold
Regional Director, Bureau of Reclamation
Upper Colorado Region
Attn: UC-402
125 South State Street
Salt Lake City, Utah 84138-1147

Dear Mr. Gold,

Thank you for the opportunity to submit the following scoping comments for the Environmental Impact Statement on the Long-term Operations for the Future Operation's of Glen Canyon Dam. The river ecosystem in Grand Canyon National Park has suffered immensely over the past forty years due to the operations of Glen Canyon Dam, and it's vital that a fresh look at the problem be undertaken. I have concerns, however, that the EIS as envisioned is destined to fail in this regard unless a number of critical issues are addressed.

First, I would like to express my tremendous dismay with the Department of Interior's mishandling of the recovery efforts in Grand Canyon National Park over the past 40 years, and that the information presented so far by the Bureau of Reclamation indicates that this EIS promises more of the same.

While new plans for ongoing investigation and experimentation can be beneficial, they are useless amidst a backdrop where the commitment to implement those plans is virtually non-existent. We've already experienced this with the completion of the first EIS twelve years ago, and there's nothing outlined in the purpose and need for this EIS process to indicate things will be any different once this process concludes. For this exercise to yield any meaningful outcome, the EIS process must be reconceived incorporating the following:

1. Restructuring the focus of the EIS on the recovery.

The principal objective should not be the long-term operation of Glen Canyon Dam, but the ingredients necessary to bring about the recovery and preservation of endangered species within the Colorado River corridor of Grand Canyon National Park. While such objectives may not be mutually exclusive, this has yet to be proven, and as such, one should precede the other. The focus must first address the ingredients necessary to restore the natural process to Grand Canyon's river ecosystem, and secondly how, and at what costs, can the Glen Canyon Dam/Lake Powell reservoir system be operated in order to achieve this. The restoration ingredients must include:

* The return of river flows consistent with the Colorado River's natural discharge into Grand Canyon.

* The re-establishment of a water temperature regime consistent with seasonal temperature variations of the Colorado River in Grand Canyon.

* The re-establishment of sediment inputs into Grand Canyon consistent with the amount that would be received in a dam-free environment.

* The elimination of non-native species, which have taken hold in the artificial riverine environment created by Glen Canyon Dam operations.

2. Evaluate the Decommissioning of Glen Canyon Dam.

The no-dam alternative must be evaluated as one means of achieving the restoration of the natural process necessary for the recovery and preservation of endangered species in Grand Canyon's river corridor. The no-dam alternative provides a valuable base line from which to evaluate other operational alternatives. Additionally, in light of the climate and human induced changes affecting flows into Lake Powell, and thus the viability of the dam to meet perceived water supply and hydroelectric benefits, BoR has additional incentive to examine a decommissioning or no-dam alternative consistent with the Council on Environmental Quality guidelines.

3. Replace the Working Groups of the Adaptive Management Program.

Despite being given specific instructions twelve years ago as outlined in the 1995 EIS on Glen Canyon Dam operations, the Glen Canyon Dam Adaptive Management Program (AMP) has failed to deliver in almost every aspect, causing Grand Canyon's river ecosystem to endure further damage. Many of AMP's failings were spelled out in the United State's Geological Survey's SCORE Report of October 2005. It was precisely these failings that have compelled BoR to undertake this new EIS process as part of its settlement agreement with environmental groups last year. Absent any structural changes to the AMP, any recommendations coming out of this EIS process will be of little value, as there are no mechanisms to ensure they won't be ignored as were those from the EIS twelve years ago.

Dominated by water supply and hydroelectric power interests, it's not surprising that the AMP has been intransigent toward addressing the true needs for endangered species recovery in Grand Canyon. Scientific, not political and commercial interests, should be the sole advisors to the Secretary of Interior on how Grand Canyon's river ecosystem should be studied, monitored and managed consistent with the recovery objectives.

Therefore, the AMP should be replaced by an open source and independent body of research and advisory scientists, where the monitoring and research data are consistently and thoroughly peer-reviewed prior to formulating any recommendations to the Secretary of Interior.

We're closing in on 50 years of ecological destruction in Grand Canyon National Park due to the operations of Glen Canyon Dam. For much of this time the public has been asking that this be remedied. We continue to lose valuable time and species as the BoR procrastinates and resists the public's mandate to put the resource first. While there are plenty of substitutes to achieve the benefits Glen Canyon Dam may provide, there will never be another Grand Canyon. It's time for the BoR to stop thwarting the public's interest to protect it.

Sincerely,

Bruce Reed